UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VIII

999 18th STREET - SUITE 500

DENVER, COLORADO 80202-2405

JAN 3 1992

Ref: 8HWM-FF

Mr. Frazer Lockhart U.S. Department of Energy Rocky Flats Office P.O. Box 928 Golden, CO 80402-0928



RE: South Interceptor Ditch Maintenance Project

Dear Mr. Lockhart:

EPA received DOE's letter regarding the preliminary scope of work for the South Interceptor Ditch (SID) maintenance project at the Rocky Flats Plant (91-DOE-11178). We understand that maintenance activities will take place within Operable Unit 5 (OU 5), yet DOE's letter did not demonstrate an intent to involve EPA and the Colorado Department of Health (CDH) in review of aspects of the project which potentially involve disturbance and/or release of hazardous substances. Therefore, we request that DOE provide EPA and CDH with a schedule for submitting the following information in response to concerns indicated in our letter of December 16, 1991:

- a. DOE's letter indicates that soil sampling will be undertaken prior to construction, a recognition that site characterization is necessary. DOE must provide a copy of the sampling plan to EPA and CDH for review. The sampling plan must demonstrate coordination with OU 5 RFI/RI activities and must be sufficient to determine the nature and extent of contamination within the construction area and to assess the risk to human health and the environment from the SID project activities.
- b. DOE states that quarterly sediment sampling has been ongoing since May, 1990. This only partially addresses our request for information about the presence and characterization of hazardous substances in the vicinity of the project. DOE must provide a summary of the available sampling results and an assessment of the data relative to human health and environmental risk as a result of the SID project activities. The summary of sediment data in the Final Phase I RFI/RI Workplan for OU 5 includes only 2 3 rounds of sampling. Apparently, from information in DOE's letter, 7 sampling rounds should be available.
- c. The project schedule does not indicate that project activities have been coordinated with the planned remedial investigation activities for OU 5. According to the final Phase

I RFI/RI Workplan for OU 5, RFI/RI field investigations will be ongoing during the proposed construction period for the SID project. We are concerned about the potential for disturbance of key/OU 5 sediment sampling locations as a result of the SID project. DOE must demonstrate that the OU 5 RFI/RI work will not be jeopardized by the SID project.

Please provide the requested schedule no later than January 24, 1992. If you need clarification of this request, please contact Bonnie Lavelle, (303) 294-1067.

Sincerely,

Marki Kerbat

Martin Hestmark, Manager Rocky Flats Project

cc: Gary Baughman, CDH/HMWMD
Joe Schieffelin, CDH/HMWMD
Barbara Barry, CDH/RFPU
Jennifer Pepe, DOE
Paul Bunge, EG&G
Tom Ottensman, EG&G